

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANGELA GLIKIN, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

MAJOR ENERGY ELECTRIC SERVICES, LLC,

Defendant.

Case No. 7:21-cv-00356

**The Honorable
Vincent L. Briccetti**

**DEFENDANT MAJOR ENERGY ELECTRIC SERVICES, LLC'S
NOTICE OF MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Brief in Support dated April 5, 2021, and the accompanying Declaration of Paul Konikowski, dated Apr. 1, 2021 (attached as Exhibit A to the Brief in Support), Defendant Major Energy Electric Services, LLC moves this Court before The Honorable Vincent L. Briccetti, in Courtroom 620 of the United States District Court for the Southern District of New York, The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, for an Order dismissing the Complaint with prejudice pursuant to Fed. R. Civ. P. 12(b)(1) and Fed. R. Civ. P. 12(b)(6) and/or for such other relief that this Court deems just and proper.

Dated: April 5, 2021
White Plains, New York

ECKERT SEAMANS CHERIN
& MELLOTT, LLC

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